

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Third Periodic Review of the	)	MB Docket 07-91
Commission's Rules and Policies	)	
Affecting the Conversion	)	
To Digital Television	)	

To: The Commission

**COMMENTS OF SCRIPPS HOWARD BROADCASTING COMPANY**

Scripps Howard Broadcasting Company, licensee of television station WPTV-DT ("WPTV"), West Palm Beach, Florida, through counsel, submits as comments the attached Engineering Statement regarding WPTV's digital allotment in response to the Federal Communications Commission's ("FCC") Notice of Proposed Rulemaking for the *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 07-91.

In the Channel Election procedure, WPTV requested and was granted Channel 12 with assigned TCD parameters based on the certification to the coverage of the initially allotted maximized Channel 55. However, the resultant antenna pattern cannot be readily achieved. In accordance with the attached Engineering Statement, WPTV desires to amend the WPTV TCD parameters to specify use of an omni-directional antenna with its TCD power.

Respectfully submitted,

SCRIPPS HOWARD BROADCASTING COMPANY

By: Kenneth C. Howard, Jr. / YB  
Kenneth C. Howard, Jr.,  
Its Attorney

August 15, 2007



**Engineering Statement**  
**John F.X. Browne, P.E.**  
**in regard to**  
**Digital Television Allotment**  
**WPTV-DT**  
**West Palm Beach, FL**

**Background**

WPTV, West Palm Beach, FL operates its analog facility on Ch 5. It was initially allotted an out-of-core (Ch 55) DTV facility with an authorized power of 1,000 kW, the maximum permissible for UHF facilities. Even with this high ERP, WPTV was unable to replicate its Ch 5 analog coverage as shown in Figure 1.

WPTV certified to its "maximized" coverage on Channel 55 which was achieved using a practical "off-the-shelf" antenna pattern.

In the Channel Election procedure, WPTV requested VHF Ch 12; the Commission granted this request and assigned TCD parameters based on the certification to the coverage of the maximized Ch 55 facility.

The translation of the Ch 55 parameters to VHF Channel 12 has resulted in the specification of an antenna pattern (as part of the TCD) that cannot be readily achieved. As



noted above and depicted on Figure 1, the WPTV analog coverage cannot be replicated even using the maximized parameters of the UHF channel allotment. The essentially omnidirectional VHF analog coverage is being replaced by a VHF digital channel with a radiation pattern that cannot be achieved with a practical antenna. Thus, if WPTV uses an omnidirectional antenna - as it desires to do in an attempt to replicate its analog service - it must reduce its power from 13.4 kW to 7.7 kW to keep the coverage from exceeding the limits established by the TCD parameters.

### **Proposal**

It is proposed to amend the WPTV TCD parameters to specify use of an omnidirectional antenna with an ERP of 13.4 kW. Specifically, the parameters would be as follows:

COORDS:	26° 35' 20" N
	80° 12' 43" W
PWR:	13.4 kW (omni)
HAAT:	392m

As shown in Figure 2, this would result in minor changes relative to the assigned TCD coverage but would not come close to matching the authorized analog Grade B contour.

### **Interference**

Interference studies were conducted using software which implements OET 69 and essentially mimics the software employed by the Commission. The results of those studies indicate that the following station would receive additional interference (in excess of that caused by the TCD). It is noted that this interference is less than that permitted by the "freeze" rules.

WTVT-DT Ch 12 Tampa, FL (0.07% increase)

**Certification**

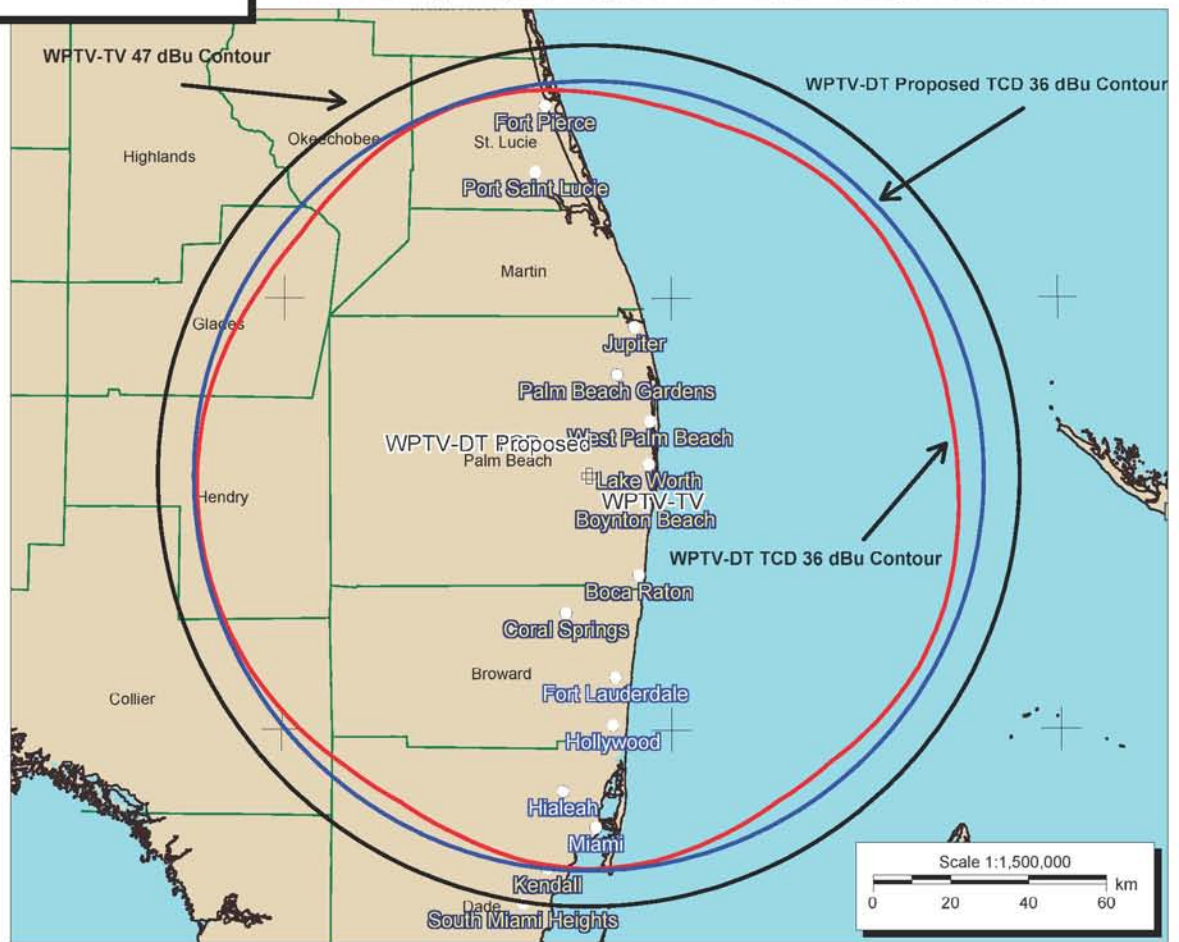
I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.

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John F.X. Browne, P.E.  
August 14, 2007



Figure 1  
8-15-07



Black - WPTV-TV 47 dBu F(50,50) Grade B Contour  
Red - WPTV-DT TCD 36 dBu F(50,90) Noise Limited Contour  
Blue - WPTV-DT Proposed TCD 36 dBu F(50,90) Noise Limited Contour

Figure 2  
8-15-07